

IN THE NORTHERN DISTRICT COURT OF OKLAHOMA
UNITED STATES OF AMERICA

PHILIP SANDERS, an Individual)
and Husband and Next of Kin of)
BRENDA JEAN SANDERS, Deceased,)

Plaintiff(s),)

-vs-)

No. 17-CV-492-JHP-FHM)

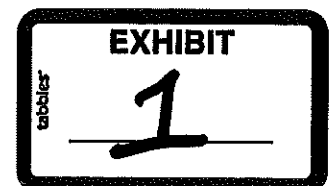
CREEK COUNTY BOARD OF COUNTY)
COMMISSIONERS, and SHERIFF)
BRET BOWLING, in his official)
capacity as Creek County)
Sheriff, and TURN KEY HEALTH)
CLINICS, a limited liability)
company.)

Defendant(s).)

DEPOSITION OF LELA J. GOATLEY,
TAKEN ON BEHALF OF THE PLAINTIFF(S),
IN THE MARTIN, JEAN, and JACKSON LAW OFFICE.

IN PONCA CITY, OKLAHOMA,
ON MONDAY, MAY 11TH, 2020,
STARTING AT 9:40 A.M.

REPORTED BY: Sherrie L. Powell, CSR
Precision Depositions
P. O. Box 118
Newkirk, OK 74647



1 body and then it goes into the blood stream and
2 they become septic.

3 Q. Have you ever treated anyone that's septic?

4 A. Yes.

5 Q. How often -- how many times have you treated
6 someone that was septic?

7 A. Oh, I -- I can't recall a number. I -- as a nurse
8 I worked in the hospital, and we had multiple
9 septic patients over the years that I've seen or
10 treated.

11 As a nurse practitioner, if I feel a patient is
12 septic before or after lab work, then I send them
13 into the hospital.

14 Q. What are the signs and symptoms that you would see
15 if someone was becoming septic?

16 A. Sometimes you don't have many signs or symptoms
17 that you see. Depending on the patient, lots of
18 times you can have a fever. Their vital signs may
19 change. Their blood pressure may drop. Their
20 pulse may go up. They may become lethargic, sleep
21 more.

22 But every patient is different, and some patients
23 you may not even know the patient was septic until
24 they're admitted to a hospital or until they get
25 so sick that, you know, they become incoherent.

1 Sepsis can come on very rapidly. It can come on
2 over time.

3 Q. Do you consider yourself an expert in the area of
4 septic?

5 A. I'm not an expert in any area. I practice.

6 Q. Do you intend to give any medical opinions in this
7 case?

8 A. No. I don't know anything about this case.

9 Q. When was your last day with Turn Key?

10 A. July 25th, 2017.

11 Q. So at that time you had worked with them ...

12 A. Couple of years.

13 Q. You started out part time. Do you know when you
14 went full time with them?

15 A. No. I don't recall.

16 Q. Okay. Did your position ever change while you
17 were with them?

18 A. No.

19 Q. Was there any other doctor you worked with other
20 than Dr. -- is it Cooper?

21 A. Uh-huh.

22 A. No.

23 Q. And where was Dr. Cooper located?

24 A. Oklahoma City.

25 Q. Does he have a practice there? Do you know?

1 A. He works full time for Turn Key as the medical
2 director.

3 Q. Besides being in Kay County jail, any other jails
4 that you worked in?

5 A. I worked six to eight jails a week when I went
6 full time.

7 Q. Were they the same six to eight jails?

8 A. Uh-huh.

9 Q. Is that a yes?

10 A. Yes. Sorry.

11 Q. That's okay.
12 which jails were those?

13 A. Okay. Let's see. There was one in Kansas, which
14 was located in Independence, Kansas. I can't
15 remember the county. There was one in Claremore,
16 Oklahoma. There was one in Muskogee. Creek
17 County. Pawhuska. I filled in at -- frequently
18 at Stillwater. I can't remember that county. Kay
19 County. Let's see. How many is that?

20 Q. I got seven.

21 A. Yeah. And then I did some telemeds with different
22 counties, and I don't recall the counties because
23 they were small little counties.

24 Q. What's telemed?

25 A. Telemed is where you get on the computer. They

1 probably would have felt comfortable continuing
2 it. Because I don't recall the policy, but I know
3 they had to take the blood pressures if somebody
4 was on blood pressure meds. I know that they
5 would had to have taken their blood pressure at
6 least once a week.

7 Q. Okay.

8 A. I'm not convinced that it wasn't more often.

9 Q. Okay. And when you look at the records for Brenda
10 Smith -- Brenda Sanders, do you find anywhere that
11 her blood pressure was ever taken except for at
12 the intake?

13 A. When she went out or when she -- when they called
14 for help.

15 Q. Yeah. Month and a half later.

16 A. That's the only thing I can see on this. Now, one
17 thing that I -- and I'm only thinking I remember
18 this, but I believe that the district supervisors,
19 the RNS, would look over these forms and advise
20 them if there was something more or less needed.

21 Q. Okay.

22 A. I -- you know, I hate to say don't quote me on
23 that, but I -- you know, that's kind of a memory I
24 have.

25 Q. Okay. So if a district supervisor got involved,

1 should they be -- should they review to make sure
2 that the medical release had been sent out to
3 confirm what medication Brenda Sanders was on?

4 A. Those are the types of things they would look for.

5 Q. Okay. And would they also be responsible for
6 reviewing to see to it that Brenda's blood
7 pressure was being taken at least once a week
8 since she's on blood pressure medication?

9 A. That would be something else that they should be
10 looking for.

11 Q. All right. Have you reviewed any of these records
12 prior to today?

13 A. No.

14 Q. All right. How did you know her blood pressure
15 medication was taken at the time she was taken by
16 ambulance?

17 A. Her blood pressure medication?

18 Q. No. I mean her blood pressure was taken.

19 A. Well, it's somewhere in here, because I saw it as
20 I was going through.

21 Q. It is in here, and I was just wondering if that's
22 how you knew.

23 A. Yeah.

24 Q. Okay.

25 A. I remember seeing -- right here. 75 over 35.

1 No. 12.

2 Q. Yeah. All right. If you go to 013.

3 A. Okay.

4 Q. Do you see that note?

5 A. Yes.

6 Q. All right. This is a note that Groom tells us
7 that he made several days after Brenda was taken
8 to the hospital. Have you ever seen this note
9 before?

10 A. No.

11 Q. It looks like he has put that he gave her
12 medication at 8 o'clock in the morning -- 8:30 in
13 the morning on the date that she was rushed to the
14 hospital. Does that look correct?

15 A. If she went in on the 17th. I don't know what
16 date she went in.

17 Q. Okay.

18 A. Isn't that -- 4-11-16. Yeah.

19 Q. Have you ever dealt with EMSA personnel?

20 A. With what personnel?

21 Q. EMSA?

22 A. What is EMSA?

23 Q. Paramedics.

24 A. No.

25 Q. Do you know what the protocol is when paramedics